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MEMO ENDORSED  
7/18/22

Kathy Manley  
Stephen F. Downs (of counsel)

So Ordered

July 15, 2022

Hon. Colleen McMahon  
United States District Judge  
Southern District of New York  
(via ecf)

*Colleen McMahon*

**United States v. Laguerre Payen, David Williams & Onta Williams 7:09-cr-558  
Compassionate Release Motions**

Dear Judge McMahon:

Please accept this as a letter on behalf of the above three defendants requesting that the Court direct the prosecution to file responses to the compassionate release motions which were all filed many months ago. (I represent Laguerre Payen, Stephen Downs represents David Williams, and Amith Gupta represents Onta Williams. Mr. Downs and Mr. Gupta adopt this letter on behalf of their respective clients.)

We have been very patient after filing the instant motions – I filed the motion for Mr. Payen over six months ago, on December 7, 2021. The motion for David Williams was filed on December 17, 2021, and the motion for Onta Williams was filed on January 27, 2022.

I have been in touch with Assistant United States Attorney Jonathan Bodansky, and I understood that he was on paternity leave for several weeks. He emailed me in early February stating that he expected to file his response (at least as to Mr. Payen, with the others to follow) within a few weeks. A couple months later, in mid-April, he returned from leave but still did not file any of the responses. In late May, I spoke to him on the telephone about this, and he indicated that he had a trial beginning June 14, which was expected to take about a week, and that he would file his response (at least as to Mr. Payen) within two weeks after the end of the trial. I emailed him again on July 11, and have not received any response.

At this point, we respectfully request that the Court direct Mr. Bodansky to respond to all three of the instant compassionate release motions by July 29, 2022. ✓

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Thank you.

Respectfully,

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